FEB 0 1 2012

MEMORANDUM FOR: Kristine Stein, PM, Kansas City District

SUBJECT: Draft Feasibility Study Report Raritan Bay Slag Superfund Site Old Bridge and Sayreville, New Jersey

- 1. The purpose of this memorandum is to evaluate the possible impacts of the proposed remediation alternatives, described in the subject report, on navigation in the Cheesequake Creek Federal Channel and on the structural function and maintainability of the jetties at the entrance.
- 2. Structural concerns: The Draft Feasibility Study Report provided by the Kansas City District describes six (6) Remedial Alternatives. Regarding the integrity and maintainability of the Western jetty the New York District found Alternative 2 and Alternative 3 to be the most acceptable. In both of these alternatives, the source material and contaminated soil is removed from the jetty area and replaced with clean material. Reducing mobility through at-the-site treatment of the contaminated materials by mixing with cement or capping in place, as proposed in Alternatives 4, 5, and 6 is not an acceptable long-term solution. There is risk that some of the contaminants may get released over time once the concrete starts to deteriorate.

These conclusions were based on descriptions of alternatives which were vague and at times confusing. With any alternative selected, no source material or contaminated material should remain on or within the jetty. The cost of any future maintenance or reconstruction of the jetty would increase should contaminated materials be encountered as appropriate handling/treatment would be required. Therefore, any alternatives that leave source material or contaminated material in place would not acceptable as a long-term solution.

- 3. Navigation concerns: The width of the Cheesequake Federal Channel is 100 ft at the entrance and the distance between the jetties is 200 ft. The authorized project depth is 5 ft. Due to the nature of currents, the west side of the entrance channel along the Western Jetty is naturally deeper than the 5 ft project depth while the east side of the entrance channel is continuously shoaling up. Should the alternative chosen require extensive structural or remedial work on the Western jetty, safe passage for channel users must be provided. Since the eastern half of the Federal Navigation Channel tends to shoal, dredging may be necessary to provide a passageway. Upon preparation of a work plan for the selected alternative, the New York District requests to review the plan for comments with regard to navigation.
- 4. If you have any questions, please contact Gerlyn Perlas, Chief, Technical Support Section at (917) 790-8414.

Randall G. Hintz

Chief, Operations Support Branch